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Attorney for the Debtors

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

In re:  
Shah Nawaz Farash and Nighat Shah Farash,  
  
Debtors,

Case No. 22-41353-mxm  
Chapter 13

**DEBTORS' RESPONSE TO TRUSTEE'S RECOMMENDATION CONCERNING  
CLAIMS AND PLAN MODIFICATION (IF REQUIRED)**

Shah Nawaz Farash and Nighat Shah Farash, ("Debtors") file this response opposed to the *Trustee's Recommendation Concerning Claims and Plan Modification (if Required)* [ECF No. 93] in the above-captioned bankruptcy proceeding.

1. On February 22, 2023, the Trustee filed a Recommendation Concerning Claims and Plan Modification listing Natural Fashions Inc. as a secured creditor and providing treatment of direct payments by the Debtors ("TRCC").
2. The Debtors object to the TRCC because Natural Fashions is not a secured creditor and should be paid along with the other unsecured creditors under their chapter 13 plan.
3. Contemporaneous with this objection, the Debtors are filing an objection to Natural Fashions Inc.'s proof of claim number 13, requesting the Court to determine that claim number 13 is wholly unsecured. *See* ECF No. 95.

DATED: March 23, 2023.

Respectfully submitted:

By: /s/ Clayton L. Everett  
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### **CERTIFICATE OF SERVICE**

I hereby certify that on March 23, 2023, a true and correct copy of the foregoing document was served to all parties receiving notice electronically in this case via the CM/ECF system.

*Via CM/ECF and US Mail to Natural Fashions. Inc.:      Via CM/ECF to Chapter 13 Trustee:*

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/s/ Clayton L. Everett  
Clayton L. Everett